

Exhibit A



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Re: Cause No. 5:24-cv-717; *Logan Paul v. Stephen Findeisen and Coffee Break Productions, LLC*; pending in the United States District Court for the Western District of Texas, San Antonio Division.

Dear counsel:

I am writing to address certain issues related to your discovery responses and production.

First, based on your written objections and document production it is not clear whether you are withholding any documents on the basis of privilege or based on some non-privilege objection. If you are withholding anything based on privilege, please serve a privilege log in accordance with Fed. R. Civ. P. 26(b)(5). Please provide a log, if any, on or before January 24, 2025.

Additionally, please provide clarification on what materials are being withheld based on non-privilege objections that you have asserted. For example, in the ZooFounders Group Chat (Bates Nos. PAUL_CZ00004159-00004254) there appear to be portions of the thread omitted, but it is impossible to tell whether this is intentional or unintentional. At the bottom of Bates No. PAUL_CZ00004219, portions of the messages regarding whether or when to sell have been omitted. This is concerning because such information is obviously central to the issues in this case and raises questions about whether other information has been withheld and on what basis.

Thus, in addition to a privilege log, we demand clarification on what information is being withheld, on what basis, and which request it is responsive to. Please provide us this clarification and/or supplemental responses on or before January 24, 2025.

Second, it appears from our review of the production that other responsive documents exist that have not been produced. For example:

- In the Telegram messages there are audio files, video files, and images that are referenced in the thread, shared and discussed between those on the thread, but not included in your production (*see, e.g.* Bates Nos. PAUL_CZ00000053, 00000088, 00000089, 00000198, 00004692);
- Some of the Telegram messages refer to other chats occurring on different platforms such as Signal (Bates No. PAUL_CZ0000392) and WhatsApp (Bates Nos. PAUL_CZ00000058, 0000444) that have not been produced; and
- While some communications between Paul and Jeffrey Levin/Danielle Strobel were produced, the small number of communications with those individuals contained in your production raises questions about whether all of them have been produced and whether any are being withheld and, if so, on what basis.

These are just examples.

Accordingly, we ask that you review your production (and have your client review his devices and files) and supplement your production with (i) all files (audio, video, image or otherwise) referenced in any of the materials produced, specifically in the group chats and Telegram messages; (ii) all other responsive communications from other platforms including, but not limited to, Signal and WhatsApp; and (iii) any other non-privileged material being withheld including, but not limited to, communications with Danielle Strobel/Jeffrey Levin and the missing text in the Founders group chats. Please supplement your document production with these materials on or before January 24, 2025.

Third, I would like to set up a call at your earliest convenience to confer on your designation of certain documents pursuant to the Confidentiality and Protective Order, ECF No. 22. Specifically, it does not appear the “Confidential” designations for the following materials are appropriate or warranted:

- PAUL_CZ00000001-00000035
- PAUL_CZ00000036-00000040
- PAUL_CZ00000041-00000044
- PAUL_CZ00000045-00000060
- PAUL_CZ00000061-00000090
- PAUL_CZ00000091-00000100
- PAUL_CZ00000102-00000118
- PAUL_CZ00000119-00000121
- PAUL_CZ00000122-00000129
- PAUL_CZ00000131-00000132
- PAUL_CZ00000133-00000156
- PAUL_CZ00000157-00000183

- PAUL_CZ00000190-00000205
- PAUL_CZ00000206
- PAUL_CZ00000207-00000220
- PAUL_CZ00000221-00000227
- PAUL_CZ00000228-00000241
- PAUL_CZ00000242-00000244
- PAUL_CZ00000245-00000246
- PAUL_CZ00000247-00000258
- PAUL_CZ00000259-00000263
- PAUL_CZ00000264-00000276
- PAUL_CZ00000277-00000282
- PAUL_CZ00000283-00000296
- PAUL_CZ00000297-00000302
- PAUL_CZ00000303-00000304
- PAUL_CZ00000305-00000307
- PAUL_CZ00000308-00000326
- PAUL_CZ00000327-00000375
- PAUL_CZ00000376-00000393
- PAUL_CZ00000394-00000425
- PAUL_CZ00000426-00000437
- PAUL_CZ00000438-00000446
- PAUL_CZ00000447-00000468
- PAUL_CZ00000840
- PAUL_CZ00003265-00003269
- PAUL_CZ00003270-00003275
- PAUL_CZ00003276-00003281
- PAUL_CZ00003395-00003396
- PAUL_CZ00003399
- PAUL_CZ00003403
- PAUL_CZ00003411-00003412
- PAUL_CZ00003449-00003450
- PAUL_CZ00003477
- PAUL_CZ00003478-00003480
- PAUL_CZ00003547
- PAUL_CZ00003548-00003571
- PAUL_CZ00003625
- PAUL_CZ00004105-00004124
- PAUL_CZ00004125-00004158
- PAUL_CZ00004159-00004254
- PAUL_CZ00004257-00004261
- PAUL_CZ00004262-00004280
- PAUL_CZ00004313-00004610
- PAUL_CZ00004611-00005019

- PAUL_CZ00005020-00005200
- PAUL_CZ00005214-00005218
- PAUL_CZ00005250
- PAUL_CZ00005256
- PAUL_CZ00005357-00005361
- PAUL_CZ00005556
- PAUL_CZ00005558-00005564
- PAUL_CZ00005565-00005622
- PAUL_CZ00005623-00005638
- PAUL_CZ00005743-00005744
- PAUL_CZ00005758-00005760
- PAUL_CZ00005934
- PAUL_CZ00005937-00005938
- PAUL_CZ00005968

These documents contain chat messages, text messages, and e-mails between Logan Paul and third parties as well as CryptoZoo meeting notes, and do not appear to constitute confidential or classified information as defined in the protective order. Pursuant to Section 11(a) of the order, please let us know your earliest availability to discuss this matter. I'm hopeful we can work through this issue without Court intervention.

Sincerely,

A handwritten signature in blue ink, appearing to read "C. Small", with a stylized flourish at the end.

Caroline Newman Small